

REMARKS

By this amendment, claims 1-24 are pending, in which claims 7, 10 and 17-22 (as renumbered) are currently amended, claims 23-24 are newly presented, and no claims are canceled or withdrawn. No new matter is introduced.

The Office Action mailed December 3, 2004 objected to the numbering of the claims and rejected claims 1-5, 8, 11, 17, 20, and 22 under 35 U.S.C. § 103(a) as obvious based on *Baker et al.* (U.S. 5,226,118) in view of *Haneda et al.* (U.S. 6,016,502) and claims 6, 7, 9-10, 12-16, 18-19, and 21 under 35 U.S.C. § 103(a) as obvious based on *Baker et al.* in view of *Haneda et al.* and further in view of *Linsey et al.* (U.S. 6,791,582).

Claims 15-16 (second occurrences) and claims 17-20 have been amended in accordance with the renumbering scheme suggested by the Office Action, thus rendering moot the objection to the claims.

Applicant respectfully traverses the rejection of claims 1-22, as none of the applied references, alone or in any reasonable combination, suggest or disclose the features of the claims. For example, independent claims 1 and 17 are each directed to a “computer-readable medium bearing instructions in a markup language for interactively presenting information to a user, said instructions arranged, upon processing by a rendering agent, to cause one or more processors executing the rendering agent to perform” certain steps. Independent claims 11 and 12 are each directed to a “computer-readable medium bearing instructions in a markup language for interactively presenting information to a user, said instructions embodied on a single web page.” Independent claim 21 is directed to the instructions borne by a “computer-readable medium bearing instructions in a markup language for interactively presenting information to a user.” None of these features are addressed by the Office Action. To establish *prima facie* obviousness

of a claimed invention, all the claim limitations must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974). “All words in a claim must be considered in judging the patentability of that claim against the prior art.” *In re Wilson*, 424 F.2d 1382, 1385, 165 USPQ 494, 496 (CCPA 1970). M.P.E.P. § 2143.03 Applicant respectfully submits that these features are neither suggested nor disclosed by any reasonable combination of the applied references.

Specifically, *Baker et al.* (per Abstract) is directed to a data analysis system in which charts are displayed by either (1) selecting a defined chart, or (2) by selecting a chart group and then selecting one or more charts from the selected group , and then simultaneously displaying the selected data analysis charts. *Baker et al.* is not concerned with any type of markup language, much less any type of markup language to be rendered by a rendering agent.

Haneda et al. fails to cure the *Baker et al.*’s lack of disclosure concerning these features. Rather, *Haneda et al.* (per Abstract) merely involves a data processing apparatus which displays chart data in the form of a chart such as a spreadsheet. When an input device is used to instruct deletion of a row or column of the chart, the row or column is deleted, the remaining rows or columns are moved closer together, and the chart is accordingly edited and displayed. Simultaneously, at the position where the row or column is deleted, an identifier is displayed. When a coordinate input device is touched on the identifier, the deleted column is restored and displayed at the original position. *Haneda et al.* too is not concerned with any type of markup language, much less any type of markup language to be rendered by a rendering agent.

Linsey et al. is directed to a collaboration space object model for providing a place consisting of rooms created by clients interacting with a client browser. Although *Linsey et al.*

discusses the use of HTTP and HTML, e.g., to display documents, *Linsey et al.* fails to suggest using markup language as recited by any of the claims.

Here, the Office Action merely contends that “Linsey shows a markup language having instructions (Linsey Col 3 Lines 1-15)” (Office Action, pp. 6 and 9) or that “Linsey mentions a document displayed on a browser and it is known [sic] that a browser contains web pages (Linsey Col 29 Lines 1-19)” (Office Action, p. 7). At col. 3: 1-15, *Linsey et al.* merely mentions that HTML may specify hyperlinks which, when selected, may cause a local computer to download HTML associated with a web page from a remote server, with the browser then rendering the HTML into a displayed web page. At col. 29: 1-19 *Linsey et al.* discusses displays 330 and 332 presented at browser 112, with reference to FIG. 11. Selection of an item in the separate window 332, which is in “a simpler html format,” causes the page or room referenced by the selected link to be displayed in the main window 112. There is no suggestion, by *Linsey et al.* or by any of the applied references, singly nor in any reasonable combination, of a rendering agent processing instructions in a markup language to cause a processor to perform the steps recited by independent claim 1 or 17, nor of markup language instructions embodied on a single web page as recited by independent claim 11 or 12, nor of a computer-readable medium bearing the instructions in the markup language as recited by claim 21.

Applicant further respectfully submits that the present invention stems from Applicant’s realization that particular combinations of dynamic rendering techniques of rendering agents for markup languages can be applied in a completely new direction to implement interactive chart navigation that provides convenience of use without compromising security or imposing large initialization delays (See, e.g., specification, ¶¶ 24-27, 44, 55), which is neither disclosed nor suggested by any combination of the applied references. It is well settled that the problem

addressed and solved by a claimed invention must be given consideration in resolving the ultimate legal conclusion of obviousness under 35 U.S.C. § 103. *North American Vaccine, Inc. v. American Cyanamid Co.*, 7 F.3d 1571, 28 USPQ 1333 (Fed. Cir. 1993); *In re Dillon*, 919 F.2d 688, 16 USPQ2d 1897 (Fed. Cir. 1990); *Northern Telecom, Inc. v. Datapoint Corp.*, 908 F.2d 931, 15 USPQ 1321 (Fed. Cir. 1990); *Jones v. Hardy*, 727 F.2d 1524, 220 USPQ 1021 (Fed. Cir. 1984). The Office Action has failed to meet its burden in this regard as well. Thus, the rejection of claims 1-22 should be withdrawn.

New dependent claim 23, which depends from claim 1, recites, “wherein said step of replacing the second chart with the third chart includes reassigning a first source attribute in a Document Object Model (DOM) object to reference an image stored in an image file associated with a second source attribute.” (See, e.g., specification, ¶ 35 and ¶ 44) New dependent claim 24, which depends from claim 1, recites “wherein said event relating to the first chart is a mouseover event relating to the first chart.” (See, e.g., specification, ¶ 35) No new matter is added. Applicant respectfully submits further that the features recited by dependent claim 23 are neither suggested nor disclosed by any reasonable combination of the applied references.

Therefore, the present application, as amended, overcomes the objections and rejections of record and is in condition for allowance. Favorable consideration is respectfully requested. If any unresolved issues remain, it is respectfully requested that the Examiner telephone the undersigned attorney at 703-425-6499 so that such issues may be resolved as expeditiously as possible.

Respectfully Submitted,

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Date

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